## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al.	§ 8
Plaintiffs,	\$ \$ \$
vs.	§ Case No. 5:21-CV-0844-XR
GREGORY W. ABBOTT, et al.	\$ \$ \$
Defendants.	<pre>\$ \$ \$ \$ \$ \$ \$ Case No. 5:21-CV-0844-XR \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$</pre>
OCA-GREATER HOUSTON, et al.	§
Plaintiffs,	<pre> § § § Case No. 1:21-CV-0780-XR</pre>
VS.	§ Case No. 1:21-CV-0780-XR
JOSE A. ESPARZA, et al.	§ §
Defendants.	\$ \$ \$
HOUSTON JUSTICE, et al.	
Plaintiffs,	\$ \$ 8
VS.	§ Case No. 5:21-CV-0848-XR
GREGORY WAYNE ABBOTT, et al.	§ §
Defendants.	<pre>\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ Case No. 5:21-CV-0848-XR \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$</pre>
LULAC TEXAS, et al.	<u> </u>
Plaintiffs,	§ § 8
VS.	§ Case No. 1:21-CV-0786-XR
JOHN SCOTT, et al.	8 § 8
Defendants.	<pre>\$ \$ \$ Case No. 1:21-CV-0786-XR \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$</pre>

MI FAMILIA VOTA, et al.	§ 8
Plaintiffs,	§ §
VS.	§ Case No. 5:21-CV-0920-XR
GREG ABBOTT, et al.	§ §
Defendants.	§ §
	§ 
UNITED STATES OF AMERICA	§ 8
Plaintiff,	\$ \$ \$
VS.	§ Case No. 5:21-CV-01085-XF
STATE OF TEXAS, et al.,	§
Defendants.	\$ \$ \$
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## **LULAC PLAINTIFFS' DISCLOSURE OF EXPERT WITNESSES**

Pursuant to Federal Rule of Civil Procedure 26(a)(2), this Court's November 18, 2021, Scheduling Order (ECF No. 125), and the parties stipulated extension of the expert discovery deadlines therein, Plaintiffs LULAC Texas ("LULAC"), Voto Latino, Texas Alliance for Retired Americans ("TARA"), and Texas AFT ("AFT" and collectively with LULAC, Voto Latino, and TARA, the "LULAC Plaintiffs"), by and through their undersigned counsel, submit the following disclosure of expert witnesses who have each prepared a written report in compliance with Federal Rule of Civil Procedure 26(a)(2)(B) that LULAC Plaintiffs will serve upon all parties on February 28, 2022:

## 1. Dr. Allan Lichtman, Ph.D.

Dr. Lichtman is a Distinguished Professor of History at American University in Washington, D.C. Dr. Lichtman is expected to provide testimony regarding the discriminatory

intent with which Senate Bill 1 was adopted. Dr. Lichtman was retained by LULAC Plaintiffs to

provide expert testimony and may be contacted through undersigned counsel.

2. Dr. Kenneth R. Mayer, Ph.D.

Dr. Mayer is a Professor of Political Science at the University of Wisconsin-Madison. Dr.

Mayer is expected to provide testimony regarding the burdens that Senate Bill 1 imposes on Texas

voters, particularly racial and ethnic minorities. Dr. Mayer was retained by LULAC Plaintiffs to

provide expert testimony and may be contacted through undersigned counsel.

3. Dr. Loren Collingwood, Ph.D.

Dr. Collingwood is an Associate Professor of Political Science at the University of New

Mexico. Dr. Collingwood is expected to provide testimony regarding the race and ethnicity of

Texas voters, particularly voters in Harris County. Dr. Collingwood was retained by LULAC

Plaintiffs to provide expert testimony and may be contacted through undersigned counsel.

LULAC Plaintiffs reserve the right to alter, amend, revise, or expand the opinions and

expert witness subjects set forth above as necessitated by further discovery or changes in

Defendants' expert witness disclosures. By this disclosure, LULAC Plaintiffs do not waive their

right to challenge the admissibility of the testimony of any experts listed by Defendants in their

disclosures.

Dated: February 28, 2022

Respectfully submitted,

/s/ Uzoma N. Nkwonta

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## **CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

Respectfully submitted,

/s/ Uzoma N. Nkwonta

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